

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 17-cv-05806-RJB

DECLARATION OF MARSHA CHIEN
IN SUPPORT OF PLAINTIFFS'
RESPONSE TO GEO'S
SUPPLEMENTAL MOTIONS IN
LIMINE

Pursuant to 28 U.S.C. § 1746(2), I, Marsha Chien, state and declare as follows:

1. I am over eighteen years of age, have personal knowledge of and competent to testify about the matters contained herein.

2. I am an Assistant Attorney General for the Attorney General of Washington and one of the attorneys representing the State of Washington in this matter.

3. Attached hereto as Exhibits A-G are true and correct copies of excerpts of the June 1-17, 2021 trial transcript as follows:

Exhibit No.	Date	Description
Exhibit A	June 3, 2021	Testimony of John Patrick Griffin, former GEO kitchen supervisor
Exhibit B	June 4, 2021	Testimony of Orlando Marquez
Exhibit C	June 7, 2021	Testimony of Maria Nayra Gomez-Sotelo
Exhibit D	June 9, 2021	Testimony of Brian Evans, GEO Chief Financial Officer
Exhibit E	June 9, 2021	Testimony of Robbin Gard, WorkSource Supervisor, Employment Security Department
Exhibit F	June 14, 2021	Court issuing jury instructions
Exhibit G	June 15, 2021	GEO's closing

4. Attached hereto as Exhibit H is a true and correct copy of excerpts of trial Exhibit 129, the GEO-ICE Contract.

5. Attached hereto as Exhibit I is a true and correct copy of excerpts of the transcript of the April 28, 2021 exhibit hearing.

6. Attached hereto as Exhibit J is a true and correct copy of excerpts of the transcript of the April 13, 2020 motion in limine hearing.

I declare, under the penalty of perjury under the laws of the United States and the State of Washington, that the foregoing is true and correct.

//

1 Dated this 20th day of September 2021 in Seattle, Washington.

2
3 s/ Marsha Chien
4 MARSHA CHIEN, WSBA No. 22027
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated this 20th day of September 2021 in Seattle, Washington.



CAITILIN HALL
Legal Assistant